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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of themselves and  
all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING  
MOTION TO SEAL**

Referral: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is Defendant Google LLC's Administrative Motion to Seal Joint Submission re Google's Request to Delete Certain Pre-Class Period Data ("Motion"). Having considered the Motion and supporting declaration and papers, and good cause having been found, the Court **ORDERS** as follows:

<b>Documents Sought to Be Sealed</b>	<b>Court's Ruling on Motion to Seal</b>	<b>Reason(s) for Court's Ruling</b>
Joint Submission re Google's Request to Delete Certain Pre-Class Period Data	GRANTED as to redacted portions at:  Pages 1:5, 1:7, 1:9-12, 1:26-28, 2:26-28, 3:2, 3:7, 3:11, 3:19, 3:22-23, 4:14, 4:16-17, 4:21-23, 4:27, 5:2-3, 5:5, 5:6-8, cover letter line 11	The information requested to be sealed also contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal logs, internal log names, their functionalities and retention periods, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. SUSAN VAN KEULEN  
United States Magistrate Judge